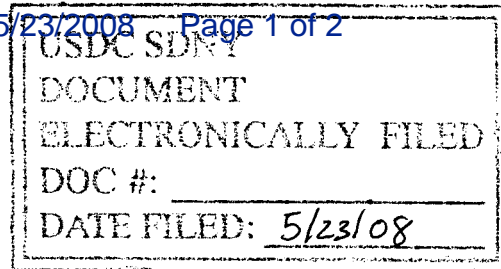


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May 6, 2008

RECEIVED

The Honorable William H. Pauley, III, U.S.D.J.
United States District Court for the Southern District of New York
500 Pearl Street
New York, New York 10007

Re: La Barbera, et al. v. Federated Mechanical
Contracting Corp. 07-CV-10998 (WHP)

Dear Judge Pauley:

This office is counsel to the Trustees of the Local 282 Benefit Funds (the "Trustees"), Plaintiffs in the above-referenced matter. We write to request that the initial conference scheduled to take place on May 9, 2008 at 2:00 PM be adjourned. This is Plaintiffs' third request that the initial conference in this case be rescheduled, the first two of which were granted. Defendant Federated Mechanical Contracting Corp. ("Defendant" or "Federated Mechanical") consents to the requested adjournment. We respectfully request that the initial conference be rescheduled for the reasons that follow.

Defendant is a party to a collective bargaining agreement with Local 282, affiliated with the International Brotherhood of Teamsters. The collective bargaining agreement incorporates by reference the Agreements and Declarations of Trust, which govern the Local 282 Benefit Funds for which Plaintiffs are the Trustees. We note that the Trust Agreement empowers the Trustees to audit the books and records of companies affiliated with signatory companies.

Plaintiffs filed this case seeking an audit of the books and records of Federated Mechanical. Commencing on April 4, 2008, independent auditors employed by the Trustees conducted a review of the books and records of Federated Mechanical. We were, subsequently, advised by the auditors that their review of the books and records revealed corporate entities which were potential affiliates of Federated Mechanical. By letter dated April 24, 2008,



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Hon. William H. Pauley, III, USDJ
May 6, 2008
Page 2

therefore, we requested the books and records of the alleged potential affiliates of Federated Mechanical.

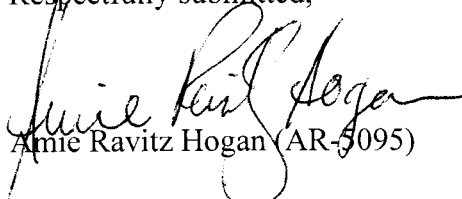
Earlier today, I spoke with a principal of Federated Mechanical and the potentially affiliated companies, Bruce Kelley, who, while denying that the non-signatory companies are affiliated with the Defendant, nevertheless indicated his willingness to provide additional records to the auditors. Mr. Kelley also indicated that Defendant does not have an attorney.

Accordingly, we respectfully request that the initial conference in this case be adjourned to allow Mr. Kelley to produce additional records demonstrating that the other companies for which he is a principal are not affiliated with the Defendant. In the event that Defendant can not do so to the Trustees' satisfaction, Plaintiffs will have no choice but to amend the complaint in this case to seek the records of the additional corporate entities.

Accordingly, Plaintiffs respectfully request that the initial conference be adjourned to provide time for the parties to settle this case or, in the alternative, to allow Plaintiffs to amend the pleadings and Defendant to obtain counsel.

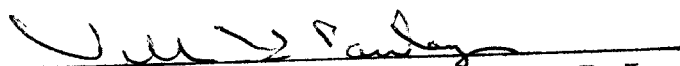
Thank you for your consideration. Please contact the undersigned should you require any additional information.

Respectfully submitted,


Amie Ravitz Hogan (AR-5095)

cc: Bruce Kelley, Federated Mechanical Contracting Corp. (by fax)
William M. Maye, Fund Manager (by fax)

Application Granted. The initial
pre-trial conference is adjourned to
June 26, 2008 at 12:00 p.m.
SO ORDERED:


WILLIAM H. PAULEY III U.S.D.J.
5/22/08